

Message

From: Moeller, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MOELLER, MICHAEL]
Sent: 5/6/2021 6:47:09 PM
To: Michael Moeller [mmoe3586@gmail.com]
Subject: FW: Removal of Receptor at Eastman's Texas Operations
Attachments: RE: [I] RE: MON Docket

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Tuesday, April 20, 2021 1:24 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: FW: Removal of Receptor at Eastman's Texas Operations

Mike – See info below regarding Eastman in Longview, TX.

From: Gossett, Stephen R <srgosset@eastman.com>
Sent: Tuesday, April 20, 2021 12:14 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Covington, Courtney L J <courtneycovington@eastman.com>; Aldredge, Tim <twaldredge@eastman.com>; Moore, Chris <chris.moore@eastman.com>
Subject: FW: Removal of Receptor at Eastman's Texas Operations

Please ensure whomever performs future modeling remove this receptor. Thanks!

From: Gossett, Stephen R
Sent: Wednesday, November 11, 2020 10:42 AM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Woody, Matthew <Woody.Matthew@epa.gov>
Subject: Removal of Receptor at Eastman's Texas Operations

This email is to provide documentation to confirm Eastman now owns the property where a receptor was added by EPA modelers to assess risk from Eastman's Longview Texas facility.

Eastman requests this receptor be removed in future risk assessments as part of MACT Technology Reviews such as the Hazardous Organic NESHAP.

For background, Eastman commented on the MON proposed rule and the issue is addressed in EPA's Response to Comments document (excerpt shown below). I also attached an email exchange I had with Matthew that led me to this discovery.

3.0 Risk Assessment and Determination

3.1 General

Comment 1: A commenter requested the EPA edit or remove one receptor used in the MON risk analysis for the Eastman Chemical Company's Longview, Texas facility [National Emissions Inventory (NEI) ID 4941511]. The commenter explained that Eastman is in the process of acquiring the residence, which is unoccupied. The commenter noted that in Appendix 4 of the *Residual Risk Assessment for the Miscellaneous Organic Chemical Manufacturing Source Category in Support of the 2019 Risk and Technology Review Proposed Rule*, the EPA lists an additional receptor for residences nearer to the facility than the census block centroids at Eastman's Longview, Texas facility. The commenter explained that the location of the additional receptor is a vacant residence that is currently

uninhabitable, and that Eastman has a signed contract to acquire the property. The commenter requested that, given that the addition of this receptor significantly increases the predicted risk, the EPA consider removal of the receptor for future modeling.

Response: We have not removed the additional receptor from the risk analysis as the commenter requests. The commenter did not provide any documentation to confirm that the residence is owned by Eastman. We acknowledge that removal of the receptor would potentially result in lower risks for this facility. Given the risks are already acceptable for the Eastman facility, and this facility was not a driver of risk for this category, removal of the receptor for this residence from the modeling data set will not change that decision, so revised modeling incorporating this change for the Eastman facility was not conducted. If the commenter provides documentation to confirm ownership of the residence, it could be considered for future modeling.

Since the time of Eastman's comment submittal on March 9, 2020, the transaction to purchase the property has been completed and is now confirmed on the county's property website (see links below and snippets of the satellite view).

There are actually two parcels.

<http://iswdataclient.azurewebsites.net/webProperty.aspx?dbkey=harrisoncad&stype=id&sdata=r4925&time=202011110922030&id=R000004925>

<http://iswdataclient.azurewebsites.net/webProperty.aspx?dbkey=harrisoncad&stype=id&sdata=r4924&time=202011110925035&id=R000004924>





Steve Gossett | Eastman

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